

EXHIBIT A

Ginther, Connie

From: Winsman, Edward
Sent: Friday, June 2, 2023 10:54 AM
To: Laubenstein, Kathleen
Subject: FW: Deadlines for responses



Edward G. Winsman

Of Counsel

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From: Lund, Juli <JLund@wc.com>
Sent: Tuesday, May 30, 2023 12:55 PM
To: Walton, David <dwalton@fisherphillips.com>; Lance Pope <lpope@pbsjlaw.com>; Homesley, Troy <thomesley@wc.com>
Cc: Grisham, Greg <ggrisham@fisherphillips.com>; Honeycutt, Mike <jhoneycutt@fisherphillips.com>; Uppal, Pavneet <puppal@fisherphillips.com>; Winsman, Edward <ewinsman@fisherphillips.com>
Subject: RE: Deadlines for responses

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Dave, we can't agree to 30 days for Plaintiffs to file oppositions to ChemTreat's pending motions. That's more than double the default time for the non-dispositive motions and compresses the already tight schedule before pre-trial filings are due. We are, however, willing to agree to short extensions for Plaintiffs' responses to ChemTreat's motions if Plaintiffs agree to a short corresponding extension for ChemTreat's replies. We think it makes the most sense to keep the schedule the same for all parties, and would propose a similar cadence for the motions filed by Plaintiffs and Ridley, but our proposal with regard to ChemTreat's motions is not conditional on that. Here is the schedule we'd propose for each motion:

- Summary judgment motions:
 - Oppositions: currently due June 15; proposed new deadline June 20 (+5 days)
 - Replies: currently due June 22; proposed new deadline June 30 (+3 days)
- Daubert motions:
 - Oppositions: currently due June 8; proposed new deadline June 12 (+4 days)
 - Replies: currently due June 15; proposed new deadline June 21 (+2 days)
- Motion To Seal:
 - Oppositions: currently due June 8; proposed new deadline June 12 (+4 days)
 - Replies: currently due June 15; proposed new deadline June 21 (+2 days)

- Sanctions motions:
 - Rule 37(b) motion: although a discovery motion, we will consent to treating this like a dispositive motion given the alternative relief sought, with the oppositions and replies due on the same schedule as the summary judgment briefing: oppositions on June 20; replies on June 30
 - Spoliation motions: as these do not seek dispositive relief, we propose the same cadence as for the *Daubert* motions:
 - Opposition: currently due June 9; proposed new deadline June 13 (+4 days)
 - Reply: currently due June 16; proposed new deadline June 22 (+2 days)

Please let us know if Plaintiffs agree to this schedule and, if so, whether the agreement applies to Plaintiffs' motions as well. Lance, please let us know your views as well. If the parties are able to reach agreement, we can prepare a stipulated order for the Court's consideration.

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From: Walton, David <dwalton@fisherphillips.com>
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Subject: Deadlines for responses

Counsel:

Please let us know if you object to agreeing for each side to have 30 days to respond to the motions filed last night.

Dave



David Walton

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